

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	
	)	
PLAINTIFF,	)	Case No.: 17-cr-107(20) (DWF/TNL)
vs.	)	
	)	
WARALEE WANLESS,	)	
	)	
DEFENDANT.	)	

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**MOTION FOR PRETRIAL NOTICE OF GOVERNMENT'S INTENT TO USE  
EVIDENCE**

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COMES NOW the defendant, Waralee Wanless, by and through her counsel, and respectfully moves this Court pursuant to Rule 12(b)(4)(B) of the Federal Rules of Criminal Procedure, for an Order requiring the government to make inquiry and provide to the Defendant written notice of any and all evidence or information subject to disclosure under Rule 16 of the Federal Rules of Criminal Procedure that the Government contemplates using in its evidence -in-chief at trial.

The Government has produced through discovery a voluminous amounts of documents, photographs, videos, and audio recording. It is anticipated that some, but not necessarily all of these items will be introduced as part of its case-in-chief against the Defendant. Therefore, it would be unfair, unreasonable, and extraordinarily time consuming for the Defendant to have to attempt to speculate as to which of those discovery items the Government intends to introduce as part of its case-in-chief.

The Defendant moves this Court to direct the Government to provide the Defendant with such notice as soon as possible, so that the Defendant may have an opportunity to object to the admissibility of any such evidence before trial as is required by Rule 12(b)(3)(C) . The Defendant further moves this Court to direct the Government to distinguish between the evidence it intends to use in its evidence-in-chief at trial and the other evidence the Defendant may be entitled to

discover under Rule 16 of the Federal Rules of Criminal Procedure.

Respectfully submitted,

RIVERS LAW FIRM, P.A..

Dated: 1/26/2018

By: 

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